

EXHIBIT TWO: Fieldworks Online List of Clients

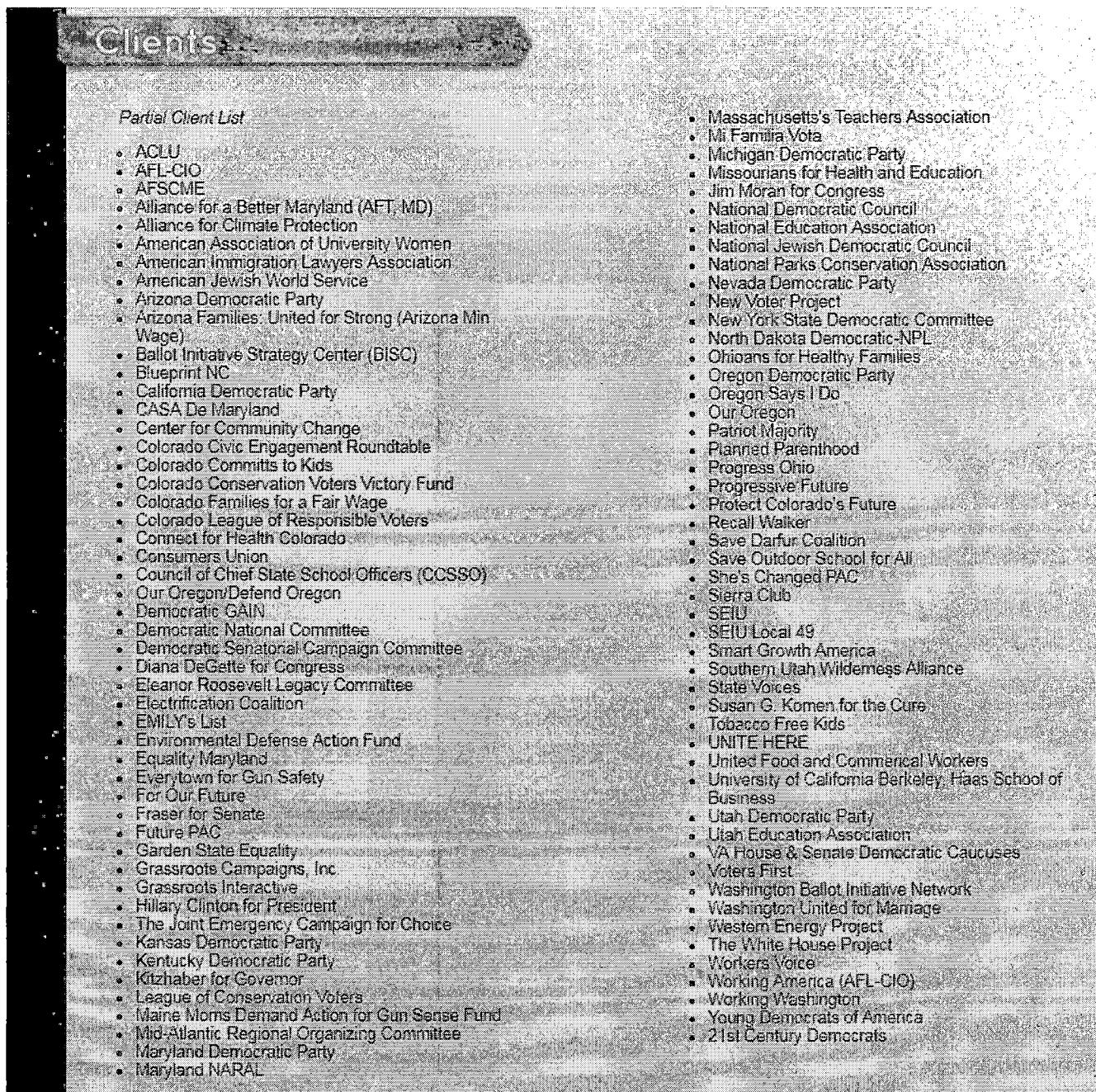


Exhibit Three: Black Canvass Director Joel Williams Praises me on Facebook

Philip Shropshire > Joel Williams
August 21, 2016 · 8s
We miss you much out here in Pittsburgh Joel.

MIRRORUNIVERSE.BLOGSPOT.COM
Mirror Universe: If you're asking what I did politically this summer: I registered over 500 voters. 90 percent black and Democratic.

It's late evening on Super Tuesday and Bernie Sanders is doing much better than expected. Still, he has an uphill battle where he finds.

1 Comment · Like · Comment

Joel Williams Hey Phillip! Miss you guys too! Interesting read! I'm not the type of guy to say I'm the best Field Director in America but hey:) More importantly you all should be very proud of the work we did in Pittsburgh! 12.5K voters registered in 55 days! You registering 500 of those is a great feat! Be proud!

Like · Reply · 2y

Exhibit Four: Justin Everett Statement to EEOC Sent on My Behalf

Hello. My name is Justin Everett, and I've also filed a claim against Fieldworks. I was a witness to Philip Shropshire's work ethic. It should be

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pointed out that Phil averaged 19.7 registrations and had registered over 500 people. He had also been the first or second person hired and was promoted to field manager within a week after being hired. He was never insubordinate. He was also never "disruptive" which is the reason that Zachary Reider then gave at his termination, in front of a roomful of people the evening of July 20th. He simply wanted to make sure that Reider knew that you couldn't legally enforce quotas here in Pennsylvania, something that Reider agreed with in emails to Philip Shropshire. Later, Reider broke that rule when he fired Maria Carey and Heather Houston for not making quota. Reider should be in a jail cell. The claims made against Phil in front of the EEOC are not only different from what he was told at termination, but he was neither insubordinate or disruptive, ever. Flat out lies. Phil wanted to work in the rain. I've seen him canvass successfully, in another job, in a snowstorm. Super professional.

Exhibit Five: Philip Shropshire Declaration on Behalf of Justin Everett, filed in his federal case

UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JUSTIN EVERETT,

Case No. 2:17-cv-01495-PJP

Plaintiff,

v.

FIELDWORKS, INC, LAURA
BARKLEY, ZACHARY REIDER, CHRIS
GALLAWAY, and LEWIS GRANOFSKY,

Defendants.

DECLARATION OF PHILIP SHROPSHIRE

I, Philip Shropshire, hereby declare and state the following:

1. My name is Philip Shropshire.
2. I have personal knowledge of the information contained in this Declaration.
3. I worked as a Canvasser and Team Lead for Fieldworks in the Pittsburgh Office, registering voters in downtown Pittsburgh from April 1, 2016 to late 7/10/16.
4. Justin Everett was a talented and conscientious voter registration canvasser, at the time likely the most skilled and effective canvasser in the Commonwealth of Pennsylvania.
5. Fieldworks encouraged canvassers to register voters who had not received Voter ID cards, even if they believed they were registered to vote, unsure re reg status.
6. Canvassers, including Everett, approached between 100 and 200 people per day, making it impossible to remember every person who had been registered or even spoken to.

7. Zachary Reider, who is white, became the Office Manager in June, 2016, replacing Joel Williams, who is African American.

8. Reider instituted a quota system, requiring canvassers to register 18 voters per day.

9. White canvassers were held to a lower quota of registering 10 voters per day.

9. Black canvassers who did not reach the quota were terminated, including Mariah Carey and Heather Houston.

10. White canvassers like Frank Carr were held to lower productivity standards.

11. Reider fired approximately one third of Fieldworks' African American staff.

12. Many of the canvassers hired to replace fired African American staff members were white.

13. Reider accused me of being disruptive and terminated my employment when I complained that the quotas were illegal and discriminatory.

I, Philip Shropshire, declare under penalty of perjury that the foregoing is true and correct.

/s/ Philip

Shropshire

Dated: March 11, 2019

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**Exhibit Six: Maryellen Hayden files lawsuit against voter
registration law**

https://www.realclearpolitics.com/2009/07/23/acorn_challenges_pa_law_as_unconstitutional_218261.html

ACORN Challenges Pa. Law as Unconstitutional

By [New York Times](#), New York Times - July 23, 2009



[Email](#)

[Print](#)

PITTSBURGH — The community organizing and voter registration group Acorn filed a federal lawsuit here Wednesday claiming that a state statute that is being used to prosecute some of its former employees is unconstitutional.

The group, whose official name is the Association of Community Organizations for Reform Now, filed the lawsuit against the Allegheny County district attorney, Stephen Zappala, who is prosecuting the former Acorn employees, and the Pennsylvania attorney general, Tom Corbett, seeking to strike down the law.

Acorn hopes the lawsuit will prevent criminal prosecution of its local leaders and office, which have been under investigation by Mr. Zappala's office for eight months, said Witold Walczak, legal director for the American Civil Liberties Union of Pennsylvania, which is representing Acorn.

"They already charged the employees, and they've hinted they might go after Acorn next," said Mr. Walczak, who believes this is the first time such a law has been challenged in federal court.

"It's the A.C.L.U.'s reading of this," he said, "that these kind of laws that restrict an organization's ability to hire and pay canvassers impacts on voter registration activities, which are constitutionally protected actions."

In May, seven people — five of whom Acorn said were former employees it had fired — were charged in Allegheny County with a variety of counts related to voter registration fraud, including "solicitation of registration," the state law being challenged in the Acorn suit.

That law makes it a crime to "give, solicit or accept payment or financial incentive to obtain a voter registration if the payment or

incentive is based upon the number of registrations or applications obtained.”

Mr. Zappala said he had agreed to not prosecute any Acorn officials until the federal case was heard.

Although the investigations of Acorn had been pushed by the Republican Party during and after last year’s presidential election, Mr. Zappala, a Democrat, said, “I’m not concerned about the political issues; I’m just concerned that we have legal voter registrations here.”

Kevin Harley, a spokesman for Mr. Corbett, a Republican, said the attorney general’s office, which is charged with defending state laws in federal court, “will defend the lawsuit.”

“We believe the state law is constitutional,” Mr. Harley said.

Pennsylvania’s law is similar to one in Nevada that was used in May to charge Acorn’s Nevada office and two of its directors in a voter registration fraud case.

Brian Mellor, senior counsel for Project Vote, an advocacy group assisting in Acorn’s defense in Pennsylvania, said there were at least nine other states with similar laws: Colorado, Florida, Georgia, Indiana, Maryland, Missouri, Ohio, Washington and Wisconsin.

Several of the defendants told investigators that Acorn had imposed a quota on them, whereby they would be fired if they did not reach a set goal of about 20 new voter registrations per six-hour shift, for which they were paid \$8 an hour.

But an Acorn official said the organization never had a quota. It had “performance standards,” said the official, Maryellen Hayden, head organizer for Acorn of Western Pennsylvania.

“We wouldn’t fire people if they didn’t reach those standards,” Ms. Hayden said. “We told people, ‘If you want to be the best voter registration worker, 20 to 25 cards is the standard.’ ”

The Pennsylvania law needs to be struck down, Ms. Hayden said, because “the way this law has been applied would mean that any

big organization that does paid voter registration drives could be subject to charges at any time.”

“That creates a fear that could impede our First Amendment rights,” she said

Exhibit Seven: New articles detailing raids by state police.

https://www.philly.com/philly/news/politics/20161101_State_raids_Delco_offices_seeking_evidence_of_voter_registration_fraud.html

State raids Delco offices, seeking evidence of voter registration fraud

by Laura McCrystal and Angela Couloumbis, STAFF WRITERS, Posted: October 31, 2016

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Pennsylvania state police have raided a Delaware County political field office seeking evidence of possible voter-registration fraud, according to court records.

In a warrant filed late last week in County Court, investigators said they were seeking documents, financial information, and lists of employees at the Norwood office of FieldWorks LLC, a national organization that often does street work for Democrats, records show.

RELATED STORIES

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- [**Trump supporter arrested for voter fraud says 'the polls are rigged'**](#)
 - [**Trump's 'rigged election' claim resonates with some GOP poll workers in Philly**](#)
 - [**Eric Trump says his father will accept election results — 'if they're fair'**](#)

The warrant did not specify the nature of the probe, but said agents also were looking for "templates . . . utilized to construct fraudulent voter registration forms" and "completed voter registration forms containing same or similar identifying information of individuals on multiple forms."

A Delaware County judge on Friday afternoon signed the search warrant, but it was not known when it was executed. The warrant application was approved by the Pennsylvania Attorney General's Office. Jeff Johnson, a spokesman for the Attorney General's Office, declined to comment.

In a statement Monday, a spokesman for FieldWorks' national headquarters in Washington, said the company has "zero tolerance for fraud."

"FieldWorks is now working with county officials to provide them with information on our program and applications they are investigating," said the spokesman, Matt Dorf. "In keeping with our regular practice, we will work aggressively with authorities to seek the prosecution of anyone involved in wrongdoing."

FieldWorks describes itself as "a nationally recognized grassroots organizing firm founded to help progressive organizations, advocacy groups, and members of the Democratic family take their public engagement and electoral strategies to the next level." It was founded in 2001, according to its promotional information online.

The company did not respond to requests for comment on which campaigns or political groups have hired them to work in Pennsylvania.

In 2012, FieldWorks' voter registration efforts in Ohio sparked some controversy. FieldWorks employees filed thousands of new voter registration cards in the final week before the registration deadline. Some of them were found to be fraudulent.

In that same election, FieldWorks included a cover letter with its mass voter filing warning that it itself viewed scores of the submitted names as fraudulent.

Police in Cincinnati arrested a former Ohio University student in 2012 working in FieldWorks on charges of forging 22 signatures on a petition drive. Police said at the time that FieldWorks itself played no role in that man's scheme to pad his list.

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Staff writer Craig R. McCoy contributed to this article.

AND:

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https://www.philly.com/philly/news/politics/20161104_Meehan_claims_criminal_conspiracy_in_Delco_voter_registration_probe.html

State police raid Philly office as voter registration probe grows

by Caitlin McCabe, Craig R. McCoy, and Angela Couloumbis, STAFF WRITERS, Posted: November 3, 2016

CHARLES FOX / STAFF PHOTOGRAPHER

Days after searching the Delaware County office of a Democratic grassroots organization for evidence of voter-registration fraud, state police on Thursday raided a second office - this one in Philadelphia. Agents executed the warrant at FieldWorks LLC's office in North Philadelphia after 5 p.m., seeking, among other things, forms that could be used to "construct fraudulent voter registration forms" and "completed voter registration forms containing same or similar identifying information of individuals on multiple forms," court documents show.

RELATED STORIES

- **After Delco raid, focus widens on voter registration group**
- **State raids Delco offices, seeking evidence of voter registration fraud**

As in the raid in Norwood, the latest warrant said investigators from the Pennsylvania Attorney General's Office suspected "tampering with public records or information" or violations of an act that regulates military and overseas ballots.

No charges have been filed against FieldWorks, a Washington-based organization, and it has pledged to cooperate with investigators. People familiar with the probe say there is currently no evidence pointing toward an effort to cast illegal or fraudulent ballots in next week's election.

At a meeting with the Inquirer's editorial board Thursday, Attorney General Bruce Beemer declined to discuss specifics of the FieldWorks case. But he said most voter-registration probes focus on canvassers caught "cutting corners when it comes to registering individuals or doing stuff to meet a quota."

Still, the latest raid signaled a widening probe into the organization - one that has drawn scrutiny in other states before - and came hours after Rep. Patrick Meehan, a Republican congressman and former prosecutor, accused FieldWorks or its employees of a "criminal conspiracy" in connection with disputed registration forms in Delaware County.

According to its website, FieldWorks recruits hourly workers nationwide, requiring no previous experience. Founded in 2001, it works with "progressive advocacy organizations, federal and state Democratic campaigns," and others.

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Its website doesn't specifically say employees face quotas, though independent job review sites about the organization mention their existence. In both the search warrants, copies of which were filed in court, investigators said they were also seeking information including " 'quota' information" or bonuses.

At the Philadelphia office Thursday, in a converted factory along the 3500 block of Scotts Lane, plainclothes investigators and uniformed state troopers executed the warrant.

FieldWorks employees on site declined to talk. A spokesman for the company referred to a statement it released earlier this week in which the firm said it has "zero tolerance for fraud" and vowed to work with authorities "to seek the prosecution of anyone involved in wrongdoing."

Republican presidential candidate Donald Trump has ignited a conversation about voter fraud after claiming the election, specifically in Pennsylvania, will be rigged.

Officials say it would be difficult for newly registered voters who used a false name, address, or driver's license number to cast a fraudulent ballot in Pennsylvania, because such voters must provide identification that matches registration information at the polls.

In the past, executives of FieldWorks have acknowledged that its business model means some of its canvassers will likely commit fraud.

In 2012, Christopher Gallaway, one of the firm's owners, testified before the board of elections for the Cincinnati area after his group flagged hundreds of possibly fraudulent registration applications.

"As an entity that hires, you know, several thousand temporary hourly employees every year . . . we have come to realize that despite our best efforts to screen people . . . there are going to be . . . employees that we hire who unfortunately try to lie to us, steal from us by getting paid for no work and commit fraud," he said, according to a hearing transcript.

Gallaway added: "We know it's going to happen, we want to be the firm that fires them right away."

He said the firm attempts to check the background of its hires and equips them with a phone with a tracking device so the company can confirm they are working. Under the law, Gallaway testified, the firm is required to submit all forms. But, he said, the group is careful to alert officials to any troubling ones.

After a news conference Thursday in Media, Meehan, whose district includes Delaware County, said that while the alleged registration fraud by FieldWorks did not necessarily mean fraud on Nov. 8, "a clear pattern of registration fraud opens the door" to that possibility.

Alongside county Republican Party Chairman Andy Reilly, the former county prosecutor and U.S. Attorney lambasted FieldWorks, alleging that the organization operates "with a different set of rules than anyone else." Meehan questioned 7,000 registration forms that he said FieldWorks "jammed down the throats" of county officials - possibly after the registration deadline passed Oct. 11.

According to Meehan, Delaware County - long a GOP stronghold - received on Oct. 14 and Oct. 17 the 7,000 forms from the Department of State without postmark, questioning if the state received them on time.

Of those, Meehan also cited applications from 52 voters registered at Delaware County addresses that he said do not exist, and forms from one apparent voter who appeared to be registered nine times at five different addresses.

The forms Meehan shared with reporters included some showing that FieldWorks suspected some of the forms it filed were incomplete or deserved more scrutiny. But by law, it contended, it had to submit them.

Delaware County Democratic Party Chair David Landau - who said neither he nor any county candidates have worked with FieldWorks - responded by lambasting Meehan and Reilly, claiming their actions were a "blatant attempt at voter suppression."

"When you register 7,000 people, there are going to be inadvertent mistakes," he said. ". . . But with the question of timeliness, they are trying to deprive 7,000 people" from voting.

Meehan disputed that challenging the registration forms amounted to voter suppression. Republicans said they did not know the party designations listed on the contested forms.

State elections officials maintain they would not forward registration applications to counties that had been delivered or postmarked after the state deadline. "The Department of State received voter registrations from FieldWorks by the deadline," a spokeswoman reiterated Thursday.

The issue will get new life again Friday. That's when the Delaware County Voter Registration Commission - composed of two Republicans and one Democrat - has called a meeting to discuss the 7,000 forms in question.

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**Exhibit Eight: Roseann's Statement to the Press on quotas
and what she had to make**

https://www.philly.com/philly/news/politics/20161105_Ex-canvasser_FieldWorks_boss_didn_t_really_care_how_we_got_our_quota_.html

Ex-canvasser: FieldWorks boss 'didn't really care how we got our quota'

by Laura McCrystal, STAFF WRITER lmccrystal@phillynews.com 610-313-8116
@Lmccrystal, Posted: November 4, 2016

When Ruthann Alexander got a political canvassing job this summer with a Democratic political organizing group, she was told to register 18 new voters a day.

But she said she usually returned to FieldWorks' Norwood office in Delaware County with just three to five new registrations after a six hour shift.

After several weeks, she was fired for not hitting the target numbers.

Pennsylvania State Police have served search warrants at FieldWorks' offices in Norwood and Philadelphia in the last week, looking for evidence of voter-registration fraud.

To Alexander, news of the investigation was not surprising. The pressure from managers to reach goals was intense, she said.

"They called it 'a daily goal,'" she said. "They didn't use the word *quota*, but it was a quota."

Goals were stressed at trainings and meetings, Alexander said.

"The manager told me and she told the room full of people that she didn't really care how we got our quota," she said. "I'm guessing she meant within reason, but she did say to me, especially when she was telling me that I needed to make my numbers, she told me she was under a lot of pressure."

Alexander, 25, of West Philadelphia, said usually she was sent to canvass in front of City Hall or along Broad Street.

"They were telling us when we canvassed on the street they were telling us it's okay to say, 'oh we have a quota and to kind of guilt people into signing,'" she said.

Alexander, who provided the Inquirer with one of her pay stubs so verify that she worked at FieldWorks for a wage of \$13 per hour, said she had trouble finding more than five people to register as new voters in a day. The most she got in was 10, which was still short of her daily target.

Alexander recalled one woman who often returned to the office with 30 or 35 registration forms -- after standing at the same locations as Alexander for six hours.

"It makes you wonder about her methods, if maybe there was some fraud involved," she said.

Under Pennsylvania law, paying people to get voter registrations based on quotas is illegal.

"A person may not give, solicit or accept payment or financial incentive to obtain a voter registration if the payment or incentive is based upon the number of registrations or applications obtained," the law states.

FieldWorks did not immediately respond to a request for comment Friday. Earlier this week, a spokesman said this week that the company has "zero tolerance for fraud" and would work with law enforcement officials "to seek the prosecution of anyone involved in wrongdoing."

In 2009, the community organizing group ACORN filed a federal lawsuit seeking to overturn the Pennsylvania statute prohibiting workers from being paid to collect a certain number of registrations, after that statute was used to prosecute ACORN employees for filling out fraudulent voter registration applications.

At FieldWorks' Norwood office, Alexander said her managers were kind, but appeared to be under a great deal of pressure to meet certain goals. When she struggled to meet goals, she was given extra training -- and warnings. "The week before I was fired (a manager) said to me, 'You know, if you don't make the 18 the next time you come in ... then that's it,'" she said.

When she was let go a week later, the manager took her outside behind the building.

"She was nice about it," Alexander said. "Then she gave me a letter of termination."

Posted: November 4, 2016 - 1:33 PM

Exhibit Nine: Order of Peter J. Phipps

Case 2:17-cv-01495-PJP Document 65 Filed 04/24/19 Page 1 of 2

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA.

JUSTIN EVERETT

Plaintiff,

v.

FIELDWORKS, INC., et al.

Defendants.

Civil Action No. 2:17-cv-1495

Hon. Peter J. Phipps

ORDER

Oral argument having been heard on April 23, 2019, and for the reasons set forth on the record and summarized below, IT IS HEREBY ORDERED that:

1. Defendants' Amended Motion for Summary Judgment, ECF No. 47 (Feb. 18, 2019), is

GRANTED IN PART and DENIED IN PART -

- Summary Judgment is entered in favor of individual defendants, Chris Gallaway and Lewis Granofsky, on all Counts for lack of personal jurisdiction. Plaintiff has not shown that those defendants possessed constitutionally sufficient minimum contacts with Pennsylvania.
- Summary Judgment is entered in favor of individual defendant, Laura Moorman, nee Barkley, on all Counts because this defendant is entitled to judgment as a matter of law; as to Title VII, it does not permit individual liability; and as to the other claims, those under 42 U.S.C. § 1981 and the Pennsylvania Human Relations Act (PHRA), there are no allegations or other record evidence of the mental culpability for those claims.
- Summary Judgment is entered in favor of individual defendant, Zachary Reider, on the claims in Count II for gender discrimination under both Title VII and the PHRA because this defendant is entitled to judgment as a matter of law; there are no allegations or other record evidence to support a claim for gender discrimination, and Title VII does not permit individual liability.

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- Summary judgment is entered in favor of individual defendant, Zachary Reider, on the claim in Count II for race discrimination because Title VII does not permit individual liability.
 - Summary judgment is entered in favor of the corporate defendant, FieldWorks, on Count II for the claims of gender discrimination under both Title VII and the PHRA because this defendant is entitled to judgment as a matter of law: there are no allegations or other record evidence to support a claim for gender discrimination.
 - Based on the sworn statements in the declaration of Philip Shropshire, ECF No. 56 (Mar. 19, 2019), genuine disputes of material fact exist as to whether individual defendant, Zachary Reider, and corporate defendant, FieldWorks, discriminated against plaintiff based on race. Those genuine and material factual disputes preclude summary judgment for defendants Reider and Fieldworks on Count I under § 1981 and Count II for race discrimination under the PHRA. Similarly, those genuine disputes of material fact also preclude summary judgment for defendant Fieldworks on Count II for race discrimination under Title VII.
 - Those remaining claims will proceed to trial. Specifically, the trial will consist of the race discrimination claims under § 1981 and the PHRA against defendant Reider as well as the race discrimination claims under § 1981, the PHRA, and Title VII against defendant Fieldworks.
2. Because plaintiff's submission, ECF No. 61 (Apr. 9, 2019), was untimely and not otherwise authorized, the Court did not consider it in resolving defendant's motion for summary judgment (although that filing would not have altered the outcome). Defendants' Motion to Strike that filing, ECF No. 62 (Apr. 11, 2019), is hereby DENIED.

BY THE COURT:

April 24, 2019
Date

/s/ Peter J. Phipps
PETER J. PHIPPS
UNITED STATES DISTRICT JUDGE